

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES, et al.,)	
)	
Plaintiffs,)	
v.)	No. 1:23-cv-00108-LMB-JFA
)	
GOOGLE LLC,)	
)	
Defendant.)	

**PLAINTIFFS' MOTION TO ENFORCE THE COURT'S MAY 30 ORDER
AND TO COMPEL PRODUCTION OF GOOGLE'S REMEDY FEASIBILITY
SUBMISSIONS TO THE EUROPEAN COMMISSION**

Pursuant to Federal Rule of Civil Procedure 37 and Local Rule 37, Plaintiffs, through their undersigned counsel, hereby seek an order (1) that Google remove redactions from any material responsive to the Court's May 30 Order, ECF No. 1450, "prepared by non-lawyers at Google," in compliance with that Order; (2) compelling production, within three days of the Court's ruling on this motion, of all remaining documents responsive to the Court's May 30 Order and a privilege log for all documents responsive to that Order; (3) compelling production of all Google statements or submissions to the European Commission that reflect analysis of the cost, burden, or difficulty of actual or potential remedies; and (4) providing Plaintiffs with leave of Court to select a subset of the documents Google produces in response to the May 30 Order for review *in camera* to ensure that Google's redactions comply with that order. The European Commission documents are responsive to Plaintiffs' Request for Production (Remedies Phase) No. 2., served on May 2, 2025. The grounds for this motion are contained in the accompanying memorandum of law. A proposed order is attached for the Court's convenience.

Dated: June 13, 2025

Respectfully submitted,

ERIK S. SIEBERT
United States Attorney

/s/ Gerard Mene
GERARD MENE
Assistant U.S. Attorney
2100 Jamieson Avenue
Alexandria, VA 22314
Telephone: (703) 299-3777
Facsimile: (703) 299-3983
Email: Gerard.Mene@usdoj.gov

/s/ Julia Tarver Wood
JULIA TARVER WOOD
MATTHEW R. HUPPERT
DAVID TESLICKO
MICHAEL E. WOLIN

United States Department of Justice
Antitrust Division
450 Fifth Street NW, Suite 7100
Washington, DC 20530
Telephone: (202) 307-0077
Fax: (202) 616-8544
Email: Julia.Tarver.Wood@usdoj.gov

Attorneys for the United States

JASON S. MIYARES
Attorney General of Virginia

/s/ Tyler T. Henry
TYLER T. HENRY
Assistant Attorney General

Office of the Attorney General of Virginia
202 North Ninth Street
Richmond, VA 23219
Telephone: (804) 692-0485
Facsimile: (804) 786-0122
Email: thenry@oag.state.va.us

*Attorneys for the Commonwealth of
Virginia and local counsel for the
States of Arizona, California,
Colorado, Connecticut, Illinois,
Michigan, Minnesota, Nebraska, New
Hampshire, New Jersey, New York,
North Carolina, Rhode Island,
Tennessee, Washington, and West
Virginia*